

From: [Dylan Schaffer](#)
To: [Matt Batezel](#); [Nicholas Peterson](#)
Cc: [Daniel Balmat](#); [Linda Avalos](#); [Edward Kerley](#)
Subject: RE: Tong v. State Farm
Date: Wednesday, October 30, 2024 2:01:20 PM
Attachments: [image001.png](#)
[STIPULATED PROTECTIVE ORDER \(Draft\) Tong v SF - KS 10 30 24.docx](#)

Counsel,

We are, sadly, back to square one. See attached with my edits.

I understand what you are doing, but it is improper and we will not agree to it. The Court has indicated its preference for the model and that is what we should be using without the additions. Also, my view is that none of the items you've indicated are protected anyway, which is the position we will take in the motion. I have agreed to enter into the model order as a simple courtesy, to get us moving forward, and to avoid yet another motion. But I see now this was always part of a simple delay game.

Fair enough, I took the bait and that's on me.

At this point, barring your almost immediate agreement to sign my edit we'll tee up the motion as it's been far too long already. As I've indicated elsewhere, all of this threatens the mediation. That is unfortunate.

Regards,

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Subject: Tong v. State Farm

Dylan and Nicholas

Attached is the proposed protective order with redline changes from the model order you provided.

Matt

Matthew F. Batezel



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